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17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 SAN FRANCISCO DIVISION

20 UNITED STATES OF AMERICA ) NO. CR 15-CR 319-001 RS  
21 )  
22 v. ) UNITED STATES' OPPOSITION TO  
23 ) DEFENDANT'S MOTION FOR RELEASE OF  
SHAUN W. BRIDGES ) PASSPORT  
24 (A/K/A "NUMBER 13"), )  
25 Defendant. )

26 The United States, through its undersigned attorneys, hereby opposes the motion filed by defendant  
27 Shaun W. Bridges for the return of his passport.  
28

1 As indicated in defendant's motion, Bridges surrendered his passport to the Pretrial Services Office  
2 for the Northern District of California in accordance with the conditions for release placed upon him by  
3 this Court following his arrest on complaint. Since then, Bridges pled guilty to a two-court Information  
4 charging him with money laundering and obstruction of justice. On December 7, 2015, Bridges was  
5 sentenced to 71 months in prison on each count to be served concurrently.

6 Defendant's motion for return of his passport was filed two days after the filing of his notice of  
7 appeal of both his conviction and sentence. Dkt. No. 103. Bridges' motion seeks an order from the Court  
8 directing the Pretrial Services Office to "hold [his] passport until such time that [he] is placed into custody.  
9 At that time, [he] requests that the passport be returned to his legal representative." Dkt. No. 105.

10 The United States submits that such a motion is both premature given the notice of appeal filed by  
11 Bridges and cause for concern given Bridges' conduct since surrendering his passport. First, the motion  
12 is premature as Bridges was not remanded into custody at the sentencing hearing as requested by the  
13 government. Instead, Bridges was permitted to self-surrender once he received a report date from the  
14 Bureau of Prisons, which will likely be sometime around the end of January 2016. Bridges' notice of  
15 appeal raises the issue of whether he will seek to remain on release pending his appeal. His motion does  
16 not address this issue. Moreover, his reference to being "being placed into custody" is vague on its face.

17 Second, as the Court is aware, Bridges made repeated attempts to change his identity between the  
18 time of his arrest and the time that he entered his guilty plea in this case. This unusual behavior -- coupled  
19 with other factors -- prompted the United States to seek the withdrawal of Bridges' release pending his  
20 guilty plea and sentencing. Although the government's requests were denied, in both instances the Court  
21 imposed further restrictive release conditions upon Bridges. The return of Bridges' passport to anyone,  
22 including his "legal representative", should not occur until after he has served his entire sentence in this  
23 case. Moreover, defense counsel has informed counsel for the government that he will not be representing  
24 Bridges on appeal which casts doubt on who, in fact, is Bridges' legal representative.

25 For the reasons stated above, the United States respectfully requests that the Court deny the subject  
26 motion.

1 DATED: December 22, 2015

Respectfully submitted,

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3 BRIAN J. STRETCH  
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4  
5 /s/  
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